

JENNIFER BERGH
Nevada Bar No. 14480
QUILLING SELANDER LOWNDS
WINSLETT & MOSER, P.C.
2001 Bryan Street, Suite 1800
Dallas, Texas 75201
Telephone: (214) 560-5460
Facsimile: (214) 871-2111
jbergh@qslwm.com
COUNSEL FOR TRANS UNION LLC

****Designated Attorney for Personal Service****
Kurt Bond, Esq.
Nevada Bar No.: 6228
6605 Grand Montecito Parkway, Suite 200
Las Vegas, Nevada 89149

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

YAUSMENDA FREEMAN,

Plaintiff,

v.

TRANSUNION, LLC,

Defendant.

Case No. 2:21-cv-01117-JAD-NJK

**UNOPPOSED MOTION AND ORDER
EXTENDING DEFENDANT TRANS
UNION LLC'S TIME TO FILE A
REPLY TO PLAINTIFF'S OPPOSITION
TO TRANS UNION LLC'S MOTION TO
DISMISS PLAINTIFF'S THIRD
AMENDED VERIFIED PETITION TO
PERPETUATE TESTIMONY
(FIRST REQUEST)**

Plaintiff Yausmenda Freeman ("Plaintiff") and Defendant Trans Union LLC ("Trans Union"), by and through their respective counsel, file this Unopposed Motion Extending Defendant Trans Union's Time to File a Reply to Plaintiff's Opposition to Trans Union LLC's Motion to Dismiss Plaintiff's Third Amended Verified Petition to Perpetuate Testimony.

1. On September 21, 2021, Trans Union filed its Opposition and Motion to Dismiss Plaintiff's Third Amended Petition to Perpetuate Testimony. On October 15, 2021, Plaintiff filed her Opposition to Trans Union LLC's Motion to Dismiss Plaintiff's Third Amended Petition to Perpetuate Testimony.

1 2. On October 20, 2021, counsel for Trans Union communicated with Plaintiff via
2 telephone regarding an extension within which to file a Reply to her Opposition to Trans Union
3 LLC's Motion to Dismiss Plaintiff's Third Amended Petition to Perpetuate Testimony and
4 agreed to a 7 day extension.

5 3. Trans Union's counsel needs additional time to review the documents and respond
6 to the allegations in Plaintiff's Opposition to Trans Union LLC's Motion to Dismiss Plaintiff's
7 Third Amended Petition to Perpetuate Testimony. Furthermore, Counsel for Trans Union will
8 be out of the office for numerous days this week to attend her grandfather's funeral.
9 Furthermore, Trans Union is working with Plaintiff to determine what information Plaintiff
10 specifically seeks from Trans Union in an effort to resolve Plaintiff's Third Amended Petition
11 without the need to utilize further judicial resources. This Unopposed Motion is made in good
12 faith and not for the purposes of delay.

13 4. Plaintiff did not oppose and agreed to October 29, 2021, as the deadline for Trans
14 Union to Reply to her Opposition to Trans Union LLC's Motion to Dismiss Plaintiff's Third
15 Amended Petition to Perpetuate Testimony.

16 Dated this 22nd day of October, 2021.

17 **Quilling Selander Lownds**
18 **Winslett & Moser, P.C.**

19 /s/ Jennifer Bergh

20 Jennifer Bergh

21 jbergh@qslwm.com

22 Nevada Bar No. 14480

23 2001 Bryan Street, Suite 1800

24 Dallas, Texas 75201

25 (214) 560-5460

26 (214) 871-2111 Fax

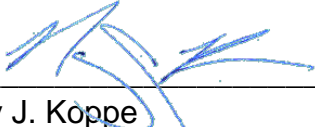
27 ***Counsel for Trans Union LLC***

28 IT IS SO ORDERED.

 Dated: October 22, 2021

 .

 .



 Nancy J. Koppe

 United States Magistrate Judge